

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
(415) 436-7200
kelsey.helland@usdoj.gov

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
Trial Attorney
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
james.todd@usdoj.gov
yuri.s.fuchs@usdoj.gov

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DEFENDANTS' UNOPPOSED
ADMINISTRATIVE MOTION TO
REMOVE INCORRECTLY FILED
DOCUMENTS (DKT. NOS. 35, 36)**

The Hon. William H. Alsup

Pursuant to Local Rule 7-11, and for good cause shown herein, Defendants respectfully request that the Court remove from the public docket the documents filed as Dkt. Nos. 35 and 36, because they contain the personal identifying information of a third party that should remain confidential.

Dkt. Nos. 35 and 36 are exhibits submitted in support of Defendants' Opposition to Plaintiffs' Motion for a Temporary Restraining Order and to Show Cause. They are, respectively, the Special Counsel's Initial Request for Stay or Personnel Action (Dkt. No. 35) and the MSPB's Non-Precedential Stay Order (Dkt. No. 36) in *Special Counsel ex rel. Doe v. OPM*, No. CB-1208-25-17-U-1 (MSPB). Defendants filed these documents without knowing that they contained non-public PII of a third party. Defendants have since filed corrected versions of these documents that have the PII redacted.

Defendants have met and conferred with Plaintiffs regarding the relief requested herein, and Plaintiffs do not oppose it. Pursuant to Civil Local Rule 7-11(a), a Stipulation and [Proposed] Order is attached hereto.

Dated: March 7, 2025

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

/s/ Kelsey J. Helland
KELSEY J. HELLAND
Assistant United States Attorney

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
Trial Attorney

Counsel for Defendants